

C.S., ET AL v. CRAIG MCCRUMB, ET AL

DEPOSITION OF AMY LEFFEL

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF MICHIGAN

C.S., by her next friend,
ADAM STROUB,

Plaintiff,

v

File No. 2:22-CV-10993-TGB

CRAIG MCCRUMB,
Individually and in his official
Capacity as Superintendent of
Durand Area Schools,

and

AMY LEFFEL, Individually and
in her Capacity as Principal
of Robert Kerr Elementary
School,

and

MICHAEL PAPANЕК,
Individually and in his
official Capacity as On
Track Coach of Robert
Kerr Elementary School,

Defendants.

/

DEPOSITION OF AMY LEFFEL

Taken by the Plaintiff on the 2nd day of December, 2022, at
432 North Saginaw Street, Flint, Michigan, at 10:00 a.m.

C.S., ET AL v. CRAIG MCCRUMB, ET AL

DEPOSITION OF AMY LEFFEL

<p>1 APPEARANCES:</p> <p>2 For the Plaintiff: MR. JOHN R. MONROE</p> <p>3 John Monroe Law PC</p> <p>4 156 Robert Jones Road</p> <p>5 Dawsonville, Georgia 30534</p> <p>6 (678) 362-7650</p> <p>7 For the Defendant: MR. DANIEL J. LOBELLO, JR. (P81069)</p> <p>8 O'Neill Wallace & Doyle PC</p> <p>9 300 Saint Andrews Road, Suite 302</p> <p>10 Saginaw, Michigan 48638</p> <p>11 (989) 790-0960</p> <p>12 Also Present: Adam Stroub</p> <p>13 Craig McCrumb</p> <p>14 Michael Papanek</p> <p>15</p> <p>16 RECORDED BY: Eric R. Johnston, CER 9267</p> <p>17 Certified Electronic Recorder</p> <p>18 Network Reporting Corporation</p> <p>19 Firm Registration Number 8151</p> <p>20 1-800-632-2720</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p style="text-align: center;">Page 2</p>	<p>1 Flint, Michigan</p> <p>2 Friday, December 2, 2022 - 9:53 a.m.</p> <p>3 MR. MONROE: Good morning. My name is John</p> <p>4 Monroe. I'm the Plaintiffs' attorney in this case. I just</p> <p>5 have some questions for you today.</p> <p>6 MS. LEFFEL: Okay.</p> <p>7 REPORTER: Do you solemnly swear or affirm that</p> <p>8 the testimony you're about to give will be the whole truth?</p> <p>9 MS. LEFFEL: I do.</p> <p>10 AMY LEFFEL</p> <p>11 having been called by the Plaintiff and sworn:</p> <p>12 EXAMINATION</p> <p>13 BY MR. MONROE:</p> <p>14 Q Could you please state your name for the record?</p> <p>15 A Yup, Amy Lynn Leffel.</p> <p>16 Q And would you spell the last name, please?</p> <p>17 A Yup, L-e-f-f-e-l.</p> <p>18 Q Thank you.</p> <p>19 A Uh-huh (affirmative).</p> <p>20 Q And have you ever given a deposition before?</p> <p>21 A No.</p> <p>22 Q Okay. Just a few things to keep in mind. There's a court</p> <p>23 reporter here taking down the questions that I ask and the</p> <p>24 answers that you give.</p> <p>25 A Okay.</p> <p style="text-align: center;">Page 4</p>
<p>1 TABLE OF CONTENTS</p> <p>2 PAGE</p> <p>3</p> <p>4 Examination by Mr. Monroe 4</p> <p>5</p> <p>6 EXHIBIT INDEX</p> <p>7 PAGE</p> <p>8 Deposition Exhibit 1 marked13</p> <p>9 (Email)</p> <p>10 Deposition Exhibit 2 marked14</p> <p>11 (Photograph of hat)</p> <p>12 Deposition Exhibit 3 marked16</p> <p>13 (School handbook)</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p style="text-align: center;">Page 3</p>	<p>1 Q So if you would make sure you wait 'til I finish asking a</p> <p>2 question before you answer it because he can't take down two</p> <p>3 at once.</p> <p>4 A Gotcha.</p> <p>5 Q And because he's taking it down, we have to have oral</p> <p>6 responses to everything.</p> <p>7 A (Nodding head in affirmative)</p> <p>8 Q So a nod of the head if accompanied by a "yes" is fine, but</p> <p>9 just a nod is not good enough.</p> <p>10 A Okay.</p> <p>11 Q And, if you would, avoid things like "uh-huh" and "unh-unh,"</p> <p>12 which people understand what that means when it's spoken but</p> <p>13 when it's taken down, it's hard to understand what that</p> <p>14 means.</p> <p>15 A Okay.</p> <p>16 Q If I ask a question that you don't understand or need some</p> <p>17 clarification, just let me know.</p> <p>18 A Okay.</p> <p>19 Q Otherwise I will assume you understood the question if</p> <p>20 you -- if you provide an answer. It's not a marathon so if</p> <p>21 you need to take a break, we'll take one. I just would ask</p> <p>22 that if there's a question on the floor, that you answer it.</p> <p>23 And then we'll take a break if you need to.</p> <p>24 A Okay.</p> <p>25 Q So can you tell me what your educational background is,</p> <p style="text-align: center;">Page 5</p>

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1 please?

2 **A Yup. So I received my bachelor's and master's from Eastern**

3 **Michigan University and was a teacher for 16 years. And**

4 **I've been an administrator for four.**

5 Q And what's your bachelor's degree in?

6 **A It's a bachelor of science -- I'm sorry -- bachelor of arts.**

7 **I had a major in English and a minor in science.**

8 Q And the master's?

9 **A It's K-12 administration.**

10 Q And what are you currently employed?

11 **A Saint Charles Community Schools.**

12 Q And where is that?

13 **A Saint Charles, Michigan.**

14 Q I'm not from around here.

15 **A Okay. So I can do the Michigan thing and go (indicating) --**

16 Q No, that's all right. I just wanted to know if -- I didn't

17 know what city that was. And what's your job there?

18 **A I am the middle/high school principal.**

19 Q Is that middle/high school so it's both?

20 **A Yes, it's 7th through 12th grades.**

21 Q And how long have you been there?

22 **A Since August.**

23 Q So this is your first school year there?

24 **A Yes.**

25 Q And where you were before that?

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1 **A I was at Durand, at Robert Kerr Elementary.**

2 Q And how long were you there?

3 **A One year.**

4 Q And what was your position at Robert Kerr Elementary?

5 **A I was the elementary principal.**

6 Q And where were you before that?

7 **A I'm sorry. Excuse me. Before that I was at Morris**

8 **Community Schools and I was there junior/senior high school**

9 **principal there for two years.**

10 Q Were the reasons for you leaving Robert Kerr related at all

11 to the -- this case?

12 **A No.**

13 Q So you were the principal at Robert Kerr Elementary on

14 February 17th of 2022; is that correct?

15 **A Correct.**

16 Q All right. And you're familiar with at least anecdotally or

17 secondhand the incident that gave rise to this lawsuit I

18 would assume; is that correct?

19 **A Yes.**

20 Q And can you tell me -- well, let me back up. I think that

21 day was designated by the school as hat day; is that right?

22 **A Correct.**

23 Q And what -- what does that mean?

24 **A So students can wear hats that are school appropriate. And**

25 **it was part of a great kindness challenge that we were**

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1 **doing.**

2 Q Okay.

3 **A So students and staff may participate.**

4 Q And can you tell me what you mean by school appropriate?

5 **A Yup. So anything that doesn't have, you know, vulgar**

6 **wording, inappropriate pictures, logos not appropriate for**

7 **school.**

8 Q Now, is what you just gave us a description of school

9 appropriate, is that different from the generally applicable

10 school dress code?

11 **A No, it's applied equally across the board, whether it be**

12 **violence, vulgar language, for example, beer logos or slang**

13 **statements, things that would not be appropriate -- I keep**

14 **using "appropriate" -- for a school setting.**

15 Q I probably didn't ask it very well. What I was intending to

16 ask was, were the rules for lack of a better word that you

17 just gave for hats, was that different from the rules that

18 applied to school dress code generally?

19 **A No.**

20 Q Those are the same?

21 **A It's universal across the board.**

22 Q Okay. So you didn't have --

23 **A Regardless of whether --**

24 Q -- different rules for hats?

25 **A -- it's a shirt or a hat -- no.**

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1 Q And when you said "no logos," do you mean the logos of any

2 products at all or just certain products?

3 **A Anything that falls within some of the identified things**

4 **that are listed in our select -- swear -- you know,**

5 **anything -- inappropriate language, weapons, violence**

6 **themes. You see things -- well, a lot of the things that**

7 **the kids might see online that -- those types of things were**

8 **just -- in general as a broad statement.**

9 Q What I was asking is, like, for example, if a student wore

10 something that had, like, the Nike Swoosh on it. I mean,

11 that's a logo. Are you saying that that would be

12 prohibited?

13 **A No, that's not perceived as school- -- as inappropriate.**

14 Q And then that particular day, that February 17th of 2022,

15 how did you become aware of the incident involving C.S. in

16 this case?

17 **A Mr. Papanek brought it to my attention.**

18 Q And what -- how did he do that?

19 **A He came down to my office to share with me what he -- his**

20 **concern.**

21 Q And before we get to those details, can you just tell us who

22 Mr. Papanek is?

23 **A Yup. Mr. Papanek is our behavior success coach.**

24 Q And what does that entail?

25 **A So he assists with discipline in regards to kids that need,**

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3 (Pages 6 to 9)

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1 like, a -- if kids have a referral, they -- they go see Mr.
 2 Papanek for minor incidences in regards to not behaving
 3 appropriately in the classroom. If they receive a write-up,
 4 they go to Mr. Papanek.
 5 Q So then circling back to -- he came to your office to
 6 discuss the incident with you; is that right?
 7 A To share his concern, yes.
 8 Q And what were his concerns?
 9 A He related the hat that he had seen because she is directly
 10 across from his office at their -- her locker. And so he
 11 saw it first thing in the morning, relayed that it had a
 12 picture of a gun on it and that it had a saying on it. And
 13 so he just came and related that to me.
 14 Q Was he asking for -- let me back up. He was your
 15 subordinate; is that correct? He reported to you?
 16 A Correct.
 17 Q So was he asking you for direction or guidance on how to
 18 deal with the situation?
 19 A Yup. He wanted to run it by me and see what I felt we
 20 should do. And I didn't feel it was an appropriate thing
 21 because I felt it -- because it was a weapon and we were in
 22 a school setting, that it was not appropriate. And so I
 23 asked for him to reach out to parents to offer an
 24 alternative, for her to wear a different hat or to remove
 25 it.

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1 Q So is it your understanding that at that point he hadn't
 2 taken -- "he" being Mr. Papanek -- he hadn't taken any
 3 action yet?
 4 A Correct. That's my understanding.
 5 Q And so then did you have any -- was that the end of your
 6 conversation with him?
 7 A No. We actually -- and I can't recall if he then reached
 8 out to Mr. Stroub and offered the alternative for him -- for
 9 her to bring in -- sorry -- for him to bring in another hat.
 10 But he did come back down and relay that he had -- well,
 11 yeah, because he had come down to relate that Mr. Stroub did
 12 not want the hat removed, that we were not to remove the hat
 13 from her.
 14 Q Okay. Let me just try to unpack that a little bit. It
 15 sounds like you had two separate conversations with Mr.
 16 Papanek?
 17 A He brought it to my attention. I directed him to reach out
 18 to parents. And then he came back down with the parent's
 19 response.
 20 Q So was your direction to him at the -- during the first
 21 meeting, was that the end of that first meeting? Or did
 22 anything more happen during that meeting?
 23 A No, not that I recall.
 24 Q So then he left and later came back and said that he had
 25 talked to C.S.'s parents and that they didn't want to

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1 replace the hat or offer an alternative; is that --
 2 A It was my understanding that -- how I interpreted what he
 3 said is that they were not bringing anything else in and
 4 that that was the hat she wanted -- they wanted her to wear.
 5 Q And then what did you at that point?
 6 A At that point I went down with him to the classroom and
 7 asked C.S. to come out and explained that she hadn't done
 8 anything wrong, it's just her hat with a picture on it isn't
 9 something that's appropriate for school. And I asked if she
 10 would place it in her locker. So she removed the hat, put
 11 it in her locker and went back to class.
 12 Q So she was wearing the hat when you went to speak with her?
 13 A Yes.
 14 Q And do you know about what time that was?
 15 A Oh, it was first thing in the morning.
 16 Q So it was early in the morning?
 17 A Yeah.
 18 Q Okay. And then did you have any further communication with
 19 anybody either in the school or outside the school?
 20 A Mr. Stroub had reached out and I ended up not getting back
 21 with him until that evening. I sent an email response to
 22 him.
 23 Q And how had he contacted you? Was that via email as well?
 24 A Good question. I can't recall. We had had a phone -- I
 25 think I had left a message. And then I had sent a follow-up

Page 12

1 email.
 2 Q When you say you left a message, you mean a -- like, a
 3 voicemail message?
 4 A I believe so. It's -- I really don't recall what order that
 5 exactly happened in.
 6 Q Does that mean that he had contacted you via phone and left
 7 you a message?
 8 A I -- all I remember is responding from the email.
 9 Q So you do recall him sending him an email?
 10 A Yes.
 11 Q Do you remember if he sent you an email?
 12 A Not after that.
 13 Q What about before that?
 14 A I would have to look.
 15 Q Do you have that with you?
 16 A Yeah.
 17 Q You can take a look.
 18 (Witness reviews document)
 19 A Yeah, so he did send an email at 3:31 p.m. And he stated,
 20 "So I'm told you guys made her put her hat in her locker
 21 after we spoke; is that true?" And then I did not respond
 22 to him until 5:17.
 23 Q Okay. If you could, take a look at what's going to be
 24 marked as Exhibit 1.
 25 (Deposition Exhibit 1 marked)

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4 (Pages 10 to 13)

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1 Q Is that the -- your email response?

2 A **Yeah; yes. Sorry.**

3 Q If C.S. was wearing the hat -- you saw the hat yourself; is

4 that right?

5 A **Yes.**

6 Q Okay.

7 (Deposition Exhibit 2 marked)

8 Q I'll show you what's been marked as Exhibit 2 that I'll

9 represent was a photograph taken of the hat. Does that

10 (indicating) look like the hat to you?

11 A **Yes.**

12 Q And so when you went down to C.S.'s classroom, at that point

13 your intention was to tell her to remove the hat; is that

14 correct?

15 A **Yes.**

16 Q All right. And you had not yet seen the hat; is that right?

17 A **No, not until I asked her to come out of class.**

18 Q All you knew about it was what Mr. Papanek had told you

19 about it?

20 A **Correct.**

21 Q And do you remember exactly what he told you about it?

22 A **I'm not exactly -- no. I know he said that there was a**

23 **weapon on it.**

24 Q Now, if you look at Exhibit 2 on the picture of the hat, can

25 you tell me what about the hat was unacceptable?

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1 A **Well, it has a weapon on it, and the phrase, "Come and take**

2 **it." I took that as threatening.**

3 Q In what way did you take that to be threatening?

4 A **The phrase itself seems like it's trying to incite someone**

5 **to come and have an altercation to take a weapon.**

6 Q You weren't aware that C.S. actually had a weapon at school,

7 were you?

8 A **No.**

9 Q And to your knowledge, she didn't have a weapon at school,

10 did she?

11 A **No.**

12 Q So when you're saying that was inciting someone to come and

13 take a weapon, was that just, like, figuratively? I mean,

14 if there wasn't a weapon, what were you saying that it would

15 incite someone to take?

16 A **Well, they're implying, "Come and take that weapon." That's**

17 **how I interpreted it.**

18 Q Are you saying the weapon on the hat? Like, the hat itself?

19 Or what?

20 A **Weapons in general.**

21 Q And then you also said the hat was objectionable because

22 of -- the hat has a depiction of a rifle on it? You said a

23 weapon; is that correct?

24 A **Correct.**

25 Q And why is that objectionable?

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1 A **Well, because we're in an elementary school setting and it**

2 **is a gun-free zone. And I didn't feel that any type of**

3 **weapons are appropriate in the school setting or anything**

4 **that suggests violence. Guns often suggest violence. And**

5 **so that was my reasoning.**

6 Q Okay. There's also a depiction of a star on the hat; is

7 that right?

8 A **Uh-huh (affirmative).**

9 Q Did you have any objection to the star?

10 MR. LOBELLO: You have to say "yes." Just a

11 reminder.

12 THE WITNESS: Oh.

13 MR. MONROE: Thank you.

14 THE WITNESS: Thank you.

15 A **Yes, I see the star. I had no -- I wasn't paying attention**

16 **to the star.**

17 Q So that wasn't a concern for you?

18 A **No.**

19 Q Now, let's start with the image of the rifle. Was there

20 anything in the -- in the student handbook that would

21 expressly prohibit the depiction of the rifle?

22 A **Well, it was at principal's discretion; anything that**

23 **incites -- has violent themes or can incite violence or**

24 **disrupt the educational setting.**

25 **(Deposition Exhibit 3 marked)**

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1 Q I'm going to show you what's been marked as Exhibit 3. Is

2 that the student handbook that was in effect at that time?

3 A **It is.**

4 Q And who wrote that handbook?

5 A **The handbook was in place when I came to Robert Kerr. And**

6 **it is reviewed by a committee every year and then put to the**

7 **board of education for approval.**

8 Q When did you start at Robert Kerr?

9 A **I started in August of '21.**

10 Q And that handbook was already in place?

11 A **This was the existing one that was there, yes. And then**

12 **it's reviewed every year and then presented to the board. I**

13 **don't recall what month it was presented to the board.**

14 Q Had the school year already started when you started?

15 A **No.**

16 Q But the handbook for that school year was already in place,

17 you say?

18 A **Well, we use the baseline handbook every year so we just**

19 **review it every year to see if there's any modifications**

20 **that need to be made.**

21 Q For the next year?

22 A **Uh-huh (affirmative).**

23 Q Had that review for the 2021/2022 school year already

24 occurred?

25 A **I don't recall.**

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5 (Pages 14 to 17)

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1 Q Well, did you take part in a review for the 2021/2022 school
2 year?

3 **A I know we had met as an administrative team to discuss it**
4 **and determine when it was going before the board. So I**
5 **don't recall making any definitive changes when I came in,**
6 **no.**

7 Q Okay. So are you saying that when you started the handbook,
8 Exhibit 3, had not yet been approved by the board?

9 **A I don't recall when it was approved by the board.**

10 Q Was it approved by the board while you were there?

11 **A I know it was approved by the board, yes. I don't know at**
12 **what point.**

13 Q Do you know whether it was approved before or after you
14 started?

15 **A I do not.**

16 Q And then you said that it was the principal's discretion
17 what was appropriate; is that correct?

18 **A Uh-huh (affirmative).**

19 Q Can you point to what in there gives the principal's
20 discretion?

21 **A "The building principal staff has the right to decide what**
22 **is offensive. But some examples are words/slogans that**
23 **advertise illegal substances, words/slogans that are**
24 **racially or religiously offensive, violence themes, vulgar**
25 **or sexual innuendo, et cetera."**

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1 Q And can you just tell us for the record what you're reading
2 from?

3 **A I am reading under "Proper Clothing" in the Bertha Neal**
4 **Robert Kerr Durand Area Schools student handbook for the**
5 **2021/2022 school year.**

6 Q And that's on page 14; is that right?

7 **A Correct.**

8 Q Before the incident on February 17th, 2022, had there been
9 any discussion within the school about the appropriateness
10 of students wearing clothing that depicted weapons?

11 **A A specific conversation regarding weapons?**

12 Q Yes.

13 **A No.**

14 Q So, I mean, if that's the case, does that mean you made the
15 decision on that day, on February 17th, 2022, that the hat
16 depicting a weapon was not appropriate?

17 **A What do you mean, did I make the decision?**

18 Q Well, my understanding from our previous discussion was that
19 you exercised discretion to determine that the hat that C.S.
20 wore to school was not appropriate; is that right?

21 **A Yes.**

22 Q And so what I'm trying to ask is, if you had already
23 considered whether the depiction of weapons on clothing
24 would be inappropriate before that day or if you made that
25 decision on that day when you became aware of the hat?

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1 **A Well, that was decision was made at the beginning of the**
2 **year based on our dress code. This fell under that. That's**
3 **how I interpret it. Because my responsibility is to enforce**
4 **the dress code across the board.**

5 Q Well, I guess what I'm -- what I'm asking is you said that
6 you had exercised your discretion with regard to the hat; is
7 that right?

8 **A Uh-huh (affirmative).**

9 Q And so what I'm trying to find out is --

10 MR. LOBELLO: You've got to say "yes." Sorry. I
11 didn't mean to interrupt.

12 THE WITNESS: Yeah. Sorry.

13 MR. LOBELLO: You've got to say "yes."

14 MR. MONROE: I appreciate it.

15 Q So what I'm trying to find out is, if you had considered the
16 issue generally of weapons depicted on clothing and decided
17 before February 17th that that wouldn't be appropriate, or
18 if you first considered it when you learned of the hat and
19 made the decision on that day that the hat wasn't
20 appropriate?

21 **A Yeah; no. From the beginning of the school year, those**
22 **things were not appropriate for the school environment.**

23 Q All right. So I -- for some reason you had considered
24 before February 17th the topic of students wearing clothing
25 depicting weapons?

Page 20

1 **A Not just weapons, anything that falls within our parameters.**

2 Q I'm asking just about clothing depicting weapons, though.
3 So are you saying that at some point --

4 **A You're asking -- sorry. I'm just trying to understand. Are**
5 **you asking me if I sat and purposely thought about just a**
6 **weapon's example prior to February 17th?**

7 Q Yes.

8 **A Without considering the entire dress code policy, I -- and I**
9 **guess maybe that's an interpretation because for me it was**
10 **any words or the slogans or anything racially offensive or**
11 **vulgar language, beer logos, other inappropriate, you**
12 **know -- advertising things that aren't appropriate. It**
13 **wasn't -- I just didn't stop and specifically think about**
14 **weapons. I thought about it all. I mean, those are things**
15 **that I have to be cognizant of and be mindful of because we**
16 **have to address -- you know, like be mindful every day as**
17 **kids come in. So I'm trying to best understand your**
18 **question.**

19 Q Well, and I'm probably having a hard time asking it. What
20 I'm wanting to know if you had considered the concept of
21 weapons on clothing before February 17th and -- even if it
22 was in conjunction with other things -- and thought, "Oh,
23 that's not appropriate," or if you hadn't really even
24 considered it before February 17th. And then when the hat
25 came up you said, "Oh, that's not appropriate."

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6 (Pages 18 to 21)

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1 **A Yeah, I -- from my own perspective, no, I do not -- I feel**
2 **there is no appropriate pictures of weapons that would be**
3 **appropriate in the school setting at any time.**
4 Q Well, I think I understand that.
5 **A Okay.**
6 Q That you don't think weapons would be appropriate. What I'm
7 wanting to know is when you made that decision?
8 **A Well, that was -- this was the first instance that school**
9 **year where I had addressed specifically a weapon clothing**
10 **violation. So, yes, at that point that was the first time I**
11 **had had to address that specifically that school year.**
12 Q So it hadn't come up before?
13 **A Not with weapons, no. Other things, yes, but not weapons.**
14 Q And then the phrase, "Come and take it." I don't imagine
15 you had considered that phrase prior to February 17th; is
16 that correct?
17 **A That particular phrase verbatim?**
18 Q Yes.
19 **A No.**
20 Q And what about that phrase did you think was inappropriate?
21 **A Well, we strive to teach kindness to our kids. And making a**
22 **declarative statement, "Come and take it," is often -- I**
23 **interpreted it as inciting an altercation or could incite an**
24 **altercation.**
25 Q I want to make sure I heard the word right. It sounded

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1 like -- to me like you said "a decorative phrase" but I
2 don't think that's what you meant.
3 **A No, I didn't say "decorative."**
4 Q Okay. Do you know what the adjective was you used before
5 phrase?
6 **A No.**
7 Q Okay.
8 **A Can he (indicating) tell me what I said?**
9 Q All right. Did you think -- let's start with the image of
10 the rifle first. Did you think that the image of the rifle
11 on the hat would cause any kind of disruption in the school?
12 **A I felt it could, yes.**
13 Q And what kind of disruption did you think it would cause?
14 **A Fear.**
15 Q Fear among?
16 **A Students.**
17 Q Did you either receive directly or via Mr. Papanek or anyone
18 else at school that any students had expressed fear
19 regarding the hat?
20 **A Not at that point because it was first thing in the morning.**
21 Q Did you later?
22 **A From students?**
23 Q Yes.
24 **A No, because we had her remove it.**
25 Q Any other kind of disruption you thought might occur other

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1 than fear among students?
2 **A I felt staff would be very uncomfortable with it as well.**
3 Q And how did you think that discomfort would manifest itself?
4 **A Well, they would communicate to me that that was -- if it**
5 **wasn't addressed, I know staff would have reached out to**
6 **notify me that we had a student wearing that and it did not**
7 **fall within our dress code policy.**
8 Q Is there any other kind of disruption you thought might
9 occur if C.S. were allowed to wear the hat?
10 **A Well, other than the -- we have students that attended --**
11 **attended Robert Kerr that had moved from Oxford. And I had**
12 **had several conversations with their parents. And those**
13 **students were receiving counseling and social work support**
14 **to deal with the trauma. And so -- and again in this day**
15 **and age, it's -- with all the school shootings we have, it's**
16 **a picture of an automatic weapon. I didn't feel it was**
17 **appropriate.**
18 Q No, I understand you didn't think it was appropriate. What
19 I was asking is, is there any other way that you thought
20 that allowing C.S. to wear the hat would cause a disruption?
21 **A Other than inciting fear?**
22 Q Yes.
23 **A I can't speak for what might have happened.**
24 Q The phrase "Come and take it," did you think that that might
25 cause a disruption?

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1 **A Possibly.**
2 Q And what kind of disruption did you think it might cause?
3 **A Again, I would only theorizing about what could have**
4 **happened. But we have young -- young kids who can be very**
5 **impetuous and could perceive that as a dare to try and take**
6 **the hat off of her.**
7 Q And other than Mr. Papanek coming and talking to you about
8 the hat, did you receive any complaints about the hat from
9 students or staff or anyone?
10 **A No, because it was first thing in the morning. Well, I did**
11 **speak with her classroom teacher. But she was aware that**
12 **Mr. Papanek was addressing it.**
13 Q Did the teacher express any concern to you about the hat?
14 **A Yes.**
15 Q What did she say?
16 **A She didn't feel it was appropriate either. She wanted me to**
17 **be aware that we had a student with a hat with a gun on it.**
18 Q Was that before or after you talked to C.S.?
19 **A It was after.**
20 Q All right. So you had already dealt with it at that time?
21 **A We had already dealt with it, yeah. But, again, she knew**
22 **that we were addressing it.**
23 Q Were you concerned that the wearing of the hat would result
24 in truancy at the school or an increase in truancy, I should
25 say?

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7 (Pages 22 to 25)

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1 **A From her or -- I'm not sure --**
 2 Q No, from others.
 3 **A From others? I hadn't considered that.**
 4 Q Did you have any concern that the wearing of the hat would
 5 cause test scores to fall?
 6 **A I'm not sure. I guess I don't understand that question.**
 7 Q Well, were you concerned that if C.S. were allowed to wear
 8 the hat that that would a negative impact on students' test
 9 scores?
 10 **A I think it would -- could disrupt the educational**
 11 **environment. So anything that is involved in that from**
 12 **classroom work, if they're taking a test that day, it could**
 13 **have impacted it if kids were uncomfortable.**
 14 Q Did you have that concern on that day?
 15 **A If I sat down and thought through the whole -- again, at**
 16 **that moment, I wasn't theorizing. I was looking at what was**
 17 **in front of me. I was applying our dress code policy.**
 18 Q And you only remained at the school, then, for the rest of
 19 that school year; is that correct?
 20 **A Correct.**
 21 Q Did anything about the policy or your enforcement of it as
 22 it would apply to the hat change during the rest of the
 23 school year?
 24 **A No.**
 25 Q So that hat wouldn't have been allowed at any time?

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1 **A At any time.**
 2 Q And then let me ask you about how the policy would apply
 3 generally. I don't want to put words in your mouth. But I
 4 understand what you've said is that any clothing depicting a
 5 weapon would not be allowed; is that correct?
 6 **A Correct.**
 7 Q So it wouldn't really matter the nature of the weapon or how
 8 it was displayed or anything like that?
 9 **A Correct.**
 10 Q Going back to Exhibit 1, you mention in the email to Mr.
 11 Stroub that you included Mr. McCrumb on the email; is that
 12 correct?
 13 **A Uh-huh (affirmative).**
 14 MR. LOBELLO: You have to say "yes."
 15 MR. MONROE: Yes, thank you.
 16 **A Yes.**
 17 Q Had you already --
 18 MR. LOBELLO: Doing fine.
 19 Q Had you already discussed the issue with Mr. McCrumb before
 20 you sent the email?
 21 **A He was in my office with me when I -- when I was notified**
 22 **of -- made aware of that.**
 23 Q Are you saying that Mr. McCrumb was in your office when Mr.
 24 Papanek came the first time?
 25 **A Correct.**

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1 Q And was Mr. McCrumb still there when Mr. Papanek came the
 2 second time?
 3 **A I don't recall that. I don't recall. He had left shortly**
 4 **thereafter. I don't recall if he was still there when Mr.**
 5 **Papanek came back for the second time.**
 6 Q Did Mr. McCrumb participate in the conversation with you and
 7 Mr. Papanek?
 8 **A He was present for it, and we just -- Mike and I -- Mr.**
 9 **Papanek and I had the conversation as to what I would like**
 10 **him to do. So I don't recall him making a specific**
 11 **statement. But he was there and -- and listened to the**
 12 **conversation.**
 13 Q So he was present, but you don't know if he participated or
 14 not?
 15 **A I don't recall him interjecting into the conversation, no.**
 16 Q And then did you have any conversation with Mr. McCrumb
 17 about it after Mr. Papanek left?
 18 **A Well, that's why I included him in this so he was aware of**
 19 **what had transpired afterwards because he was there when it**
 20 **was first brought to my attention. So I wanted him to be**
 21 **aware of what I communicated back.**
 22 Q Well, had you had any conversation with him about it
 23 between --
 24 **A That and this (indicating)?**
 25 Q Yes.

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1 **A I don't recall if I -- if I did or not.**
 2 Q You didn't have any email exchange with him about it?
 3 **A I would have to look. I'll be honest. I really don't**
 4 **recall. I would have to look back and see.**
 5 Q And then other than -- well, let me strike that. Before the
 6 lawsuit was filed, did you have any discussion with Mr.
 7 McCrumb about the incident?
 8 **A Not afterwards, no.**
 9 MR. MONROE: That's all the questions I have.
 10 MR. LOBELLO: No questions for me. You're all
 11 set.
 12 (Deposition concluded at 10:27 a.m.)
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